

JUL 22 2003

**CERTIFIED MAIL**

**RETURN RECEIPT REQUESTED**

Article No. 7002 0860 0006 5960 1413

Mr. Scott Loven  
HS & EQ Manager  
Industrial Laminates/Norplex, Inc.  
665 Lybrand Street  
P.O. Box 977  
Postville, Iowa 52162

Dear Mr. Loven:

RE: Industrial Laminates/Norplex, Inc.  
Postville, Iowa  
RCRA ID No. IAD073489288

Letter of Warning

On May 8, 2003, a representative of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA). A copy of that inspection report is enclosed.

At the time of the inspection, you were presented with a Notice of Preliminary Findings (NOPF) which described the observations and recommendations reported to EPA. I have reviewed the inspection report and the NOPF and have determined that the enclosed list of RCRA violations were documented. I have also reviewed your May 22, 2003 and July 15, 2003, responses to the NOPF and determined that no further submittals are required at this time to address the violations. Please note that EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of this inspection

I would like to remind you that your facility is responsible for maintaining compliance with all applicable hazardous waste regulations. If there are any questions regarding this matter, please contact Kori Kuehl, of my staff, at (913) 551-7154.

Sincerely,

Diane L. Huffman  
Chief  
RCRA Enforcement and State Programs Branch

Enclosures 2

cc: Cal Lundberg  
Iowa Department of Natural Resources

bcc: John Bosky  
ENSV, w/list of violations



R00416868

RCRA RECORDS CENTER

RESP  
KUEHL

RESP  
BUCKNER

RESP  
HUFFMAN

7/18/03

7/18/03

**Notice of Violations**

1. 40 CFR 265, subpart D- failure to submit a revised contingency plan to local authorities. In order to correct this violation, Industrial Laminates/Norplex, Inc. must ensure that the Contingency Plan is updated as necessary, and submitted to the appropriate local authorities.
2. 40 CFR 265.16(d)(1) - failure to have documents and records maintained at the facility to include job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job. In order to correct this violation, Industrial Laminates/Norplex, Inc. must ensure that the documents and records include the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.
3. 40 CFR 265.16(d)(3)- failure to have written description of type and amount of introductory & continuous training for all positions at the facility that are related to hazardous waste management. In order to correct this violation, Industrial Laminates/Norplex, Inc. must ensure that the documents have a written description of the type and amount of introductory and continuous training for all positions at the facility that are related to hazardous waste management.
4. 40 CFR 265.16(d)(4)- failure to maintain records that document hazardous waste training of employees. In order to correct this violation, Industrial Laminates/Norplex, Inc. must maintain records that document hazardous waste training for each employee handling hazardous waste.
5. 40 CFR 265.52(d)- failure to include the telephone numbers and addresses for all persons qualified to act as emergency coordinators in the contingency plan. In order to correct this violation, Industrial Laminates/Norplex, Inc. must ensure that the contingency plan has telephone numbers and addresses for all persons qualified to act as emergency coordinators.
6. 40 CFR 265.52(e)- failure to include a list and description of emergency equipment in the contingency plan. In order to correct this violation, Industrial Laminates/Norplex, Inc. must ensure that the contingency plan has a list and description of emergency equipment.
7. 40 CFR 273.13(d)(1)- failure to keep universal waste lamps containers closed except when adding or removing universal waste lamps. In order to correct this violation, Industrial Laminates/Norplex, Inc. must ensure that all spent lamps are stored in closed containers.
8. 40 CFR 273.14(e)- failure to label universal waste lamps container with the words, "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." In order to correct this violation, Industrial Laminates/Norplex, Inc. must ensure that all lamps or containers in which the lamps are stored are marked with one of the following phrases: "Universal Waste- Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 NORTH 5TH STREET  
KANSAS CITY, KANSAS 66101

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Diane L. Huffman  
Chief

RCRA Enforcement and State Programs Branch

Enclosures 2

cc: Cal Lundberg  
Iowa Department of Natural Resources



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		A. Signature X <i>Charles Thornton</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	
1. Article Addressed to:  <div style="border: 1px solid black; padding: 5px; margin: 10px;"> Mr. Scott Loven, HS &amp; EQ Manager  Industrial Laminates/Norplex, Inc.  665 Lybrand Street  P.O. Box 977  Postville, Iowa 52162 </div>		B. Received by (Printed name) <i>Charles Thornton</i> C. Date of Delivery <i>7-24-03</i> D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:	
2. Article Number (Transfer from se		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. 4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	
7002 0860 0006 5960 1413		PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1035	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OFFICIAL USE	
Postage \$  Certified Fee  Return Receipt Fee (Endorsement Required)  Restricted Delivery Fee (Endorsement Required)  Total Postage \$	Postmark Here
Sent To Street, Apt. No.; or PO Box No. City, State, ZIP+	Mr. Scott Loven, HS & EQ Manager Industrial Laminates/Norplex, Inc. 665 Lybrand Street P.O. Box 977 Postville, Iowa 52162
PS Form 3800, April 2002 See Reverse for Instructions	